

#### Universal Service Reform that Benefits All Americans

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# The Universal Service for America (USA) Coalition Supports Fair Reform

- Rural mobile service providers formed the USA Coalition to improve competition for the benefit of consumers and carriers.
- The USA Coalition supports regulatory policies that will enable Americans to enjoy the full potential of wireless communications, regardless of where they live and work.
- The USA Coalition is dedicated to ensuring that our nation's universal service programs are not technologically or competitively discriminatory.



## Universal Service Is Important for All Americans

- A vibrant, robust, and redundant communications network throughout the nation is key to the economic strength and public safety of the United States.
- In order to ensure the vibrancy, robustness, and redundancy of the communications network in rural, insular, and high-cost areas, service must be affordable for residents of those areas.
- Service will be affordable in some rural, insular, and high-cost areas only with support from universal service funds.



## Technological and Competitive Neutrality Promotes Adoption of New Technologies

- Technological and competitive neutrality facilitates the rapid and efficient implementation of technological innovations.
- Policies that favor specific technologies or classes of carriers slow the implementation of new technologies.
- The best way to facilitate vibrant, robust, and redundant networks is to allow Americans to decide which service, technology, and service provider best serves their needs.



# Reforms Must Facilitate the Goal of Universal Service

- Support must be allocated and distributed in the manner that best facilitates achievement of the goal of universal availability of affordable services.
- FCC rules and policies should not create incentives for any carrier to become, or remain, inefficient in order to receive more universal service.





# The USF Should Be Used Only To Achieve the Goal of Universal Service

- The USF should not be used to shield certain carriers from the economic impact of intercarrier compensation reform.
  - The FCC should not add another component to the ICLS for any carrier, particularly if the component, or ICLS in general, is made available only to certain types of carriers.
  - The retention of the interim CETC cap cannot be supported for any reason, nor can the fact that the CETC cap limits USF growth justify an increase in the ICLS.
- The FCC should adopt technologically and competitively neutral criteria designed to achieve the goal of universal service, and then distribute support to any carrier that meets the criteria.



#### The USA Coalition

- Membership:
  - Carolina West Wireless
  - Cellular South
  - Mobi PCS
  - Thumb Cellular

- Cellular One
- Corr Wireless Communications
- SouthernLINC Wireless
- U.S. Cellular
- For more information, contact:

Todd D. Daubert Kelley Drye & Warren LLP 3050 K Street, N.W., Suite 400 Washington, DC 20007 (202) 342-8602 tdaubert@kelleydrye.com

